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Attorneys for Respondents  
CHEVRON CORPORATION and CHEVRON U.S.A.  
INC.

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

*IN RE* APPLICATION OF THEOPHILUS G.  
METSAGHARUN, *et al.* FOR AN ORDER  
GRANTING LEAVE TO ISSUE  
SUBPOENAS FOR THE TAKING OF  
DISCOVERY PURSUANT TO 28 U.S.C. §  
1782

**Case No. 12-80274 MISC JSW (KAW)**

**JOINT STATUS REPORT**

Courtroom: 4  
Judge: Hon. Kandis A. Westmore

Applicants and Respondents file this joint status report in response to the Court's March 25, 2014, order. As previously noted, the parties have successfully negotiated a settlement agreement. The agreement is now fully executed. Respondents executed the agreement on March 31, 2014; Applicants executed a version of the agreement on February 28, and then re-executed a modified version on April 2, 2014.

Although the settlement agreement is fully executed, a dispute has arisen regarding the parties' obligations under the agreement. Despite lengthy discussion, the parties have been unable to resolve this dispute. Applicants' position is that under the terms of the agreement, dismissal is inappropriate at this date, and that the dispute should be submitted to the Court. Respondents disagree and have agreed to include their position in a joint filing to expedite a final resolution. The parties expect to submit the joint filing to the Court tomorrow, April 30, 2014.

Pursuant to Local Rule 5-1(i)(3), I, Richard Herz, attest that concurrence in filing this document has been obtained from the other signatory.

Dated: April 29, 2014

EARTHRIGHTS INTERNATIONAL

By: /S/ Richard Herz

Richard Herz (*pro hac vice*)

Counsel for Applicants  
THEOPHILUS G. METSAGHARUN, et  
al.

Dated: April 29, 2014

JONES DAY

By: /S/ David L. Wallach

David L. Wallach

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